

# **EXHIBIT D**

## Kwan, Adrian

---

**From:** Pio Suh <suh@ipcom-munich.com>  
**Sent:** Wednesday, June 26, 2019 12:31 PM  
**To:** Kwan, Adrian  
**Cc:** Akerley, Stephen; Ducker, Philip; Igor Kurtes  
**Subject:** WG: Proposal  
**Attachments:** Docket 001 - Complaint and Exhibits.pdf

**Importance:** High

FYI

---

**Von:** Kathryn Tsirigotis <ktsirigotis@lenovo.com>  
**Gesendet:** Freitag, 15. März 2019 18:53  
**An:** Pio Suh <suh@ipcom-munich.com>  
**Cc:** Kathryn Tsirigotis <ktsirigotis@lenovo.com>  
**Betreff:** Proposal  
**Priorität:** Hoch

*WITHOUT PREJUDICE AND FOR SETTLEMENT PURPOSES ONLY  
Subject to FRE Rule 408*

Pio,

As a follow-up to my email from yesterday providing Lenovo's FRAND offer for a license to IPCom's patent portfolio, attached is a copy of a complaint that we have filed against IPCom in the Northern District of California. In the event that we are unable to agree upon FRAND terms consistent with the ETSI IPR Policy, Lenovo has asked the court to determine the FRAND licensing terms and rates for the parties. I want to reiterate, however, that Lenovo remains a willing licensee and we hope to finalize an agreement with IPCom on FRAND terms in the near future. I look forward to hearing from you.

Best regards,  
Kathryn

**Kathryn Tsirigotis**  
Director of Licensing  
1009 Think Place  
Morrisville, NC 27560  
Lenovo

**T** 919-257-5324  
**M** 919-592-8130  
**F** 919-294-3343  
**E** ktsirigotis@lenovo.com

[Lenovo.com](http://Lenovo.com)  
[Twitter](#) | [Facebook](#) | [Instagram](#) | [Blogs](#) | [Forums](#)

This e-mail may contain confidential or privileged information. Use or disclosure by other than intended recipient is unauthorized. If you are not an intended recipient, please notify sender and delete this e-mail.